PILLSBURY WINTHROP SHAW PITTMAN LLP
BARBARA L. CROUTCH #151428
Barbara.croutch@pillsburylaw.com
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: (213) 488-7100
Facsimile: (213) 629-1033

PILLSBURY WINTHROP SHAW PITTMAN LLP
RICHARD M. SEGAL #156975
Richard.segal@pillsburylaw.com
501 West Broadway, Suite 1100
San Diego, CA 92101-3575
Telephone: (619) 234-5000
Facsimile: (619) 236-1995

Attorneys for Defendants
MITSUBISHI HEAVY INDUSTRIES, LTD., a Japanese corporation; MITSUBISHI NUCLEAR ENERGY SYSTEMS, INC., a Delaware corporation; and MITSUBISHI HEAVY INDUSTRIES AMERICA, INC., a Delaware corporation

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

SAN DIEGO GAS & ELECTRIC COMPANY, a California corporation,

Plaintiff,

vs.

MITSUBISHI HEAVY INDUSTRIES, LTD, a Japanese Corporation, MITSUBISHI NUCLEAR ENERGY SYSTEMS, INC., a Delaware corporation, MITSUBISHI HEAVY INDUSTRIES AMERICA, INC., a Delaware corporation, and DOES 1 through 25, inclusive,

Defendants.

No. 13-cv-1726-WQH-WMC

NOTICE OF MOTION AND MOTION STAY PROCEEDINGS PENDING ARBITRATION

Date: September 16, 2013
Time: 11:00 a.m.
Courtroom: 14B

NO ORAL ARGUMENT UNLESS REQUESTED BY THE COURT

PLEASE TAKE NOTICE that on September 16, 2013, at 11:00 a.m., or as soon thereafter as the Court otherwise orders, in Courtroom 14B before the Honorable William Q. Hayes, Defendants MITSUBISHI HEAVY INDUSTRIES, LTD., a Japanese corporation ("MHI"), MITSUBISHI NUCLEAR ENERGY SYSTEMS, INC., a Delaware corporation ("MNES"), and MITSUBISHI HEAVY INDUSTRIES AMERICA, INC., a Delaware corporation ("MHIA") (collectively, "Defendants") will and hereby do move, pursuant to sections 2 and 3 of the Federal Arbitration Act, 9 U.S.C. §§ 2, 3, for an order to stay these proceedings pending arbitration of Plaintiff's claims.

This Motion is based on this Notice of Motion and Motion, the Memorandum of Points and Authorities, the declaration of Barbara L. Croutch, all pleadings of record in this action, and on such other and further evidence and argument, written and oral, as may be presented to the Court at or prior to any hearing on the Motion.

Dated: August 8, 2013.

PILLSBURY WINTHROP SHAW PITTMAN LLP
BARBARA L. CROUTCH
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406

PILLSBURY WINTHROP SHAW PITTMAN LLP
RICHARD M. SEGAL
501 West Broadway, Suite 1100
San Diego, CA 92101-3575

By /s/ Barbara L. Croutch
Barbara L. Croutch
Attorneys for Defendants
MITSUBISHI HEAVY INDUSTRIES, LTD., a Japanese corporation; MITSUBISHI NUCLEAR ENERGY SYSTEMS, INC., a Delaware corporation; and MITSUBISHI HEAVY INDUSTRIES AMERICA, INC., a Delaware corporation